

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

ROBIN SCHLOESSER,)	
)	
Plaintiff,)	Case No. 3:21-cv-00386-KAC-HBG
)	
v.)	
)	
FLAGSHIP CREDIT ACCEPTANCE LLC,)	
EXPERIAN INFORMATION SOLUTIONS, INC,)	
and EQUIFAX INFORMATION SERVICES LLC,)	
)	
)	
Defendants.)	

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC’S
ANSWER TO PLAINTIFF’S COMPLAINT**

Defendant, Equifax Information Services LLC (“Equifax”), by Counsel, files its Answer to Plaintiff’s Complaint (“Complaint”) as follows:

PRELIMINARY STATEMENT

Equifax denies any and all allegations in the headings and/or unnumbered paragraphs in the Complaint.

ANSWER

1. As to the first sentence of Paragraph 1, Equifax admits Plaintiff asserts claims pursuant to the Fair Credit Reporting Act (“FCRA”). Equifax denies all remaining allegations in this sentence. As to the second sentence of Paragraph 1, Equifax states Plaintiff’s Complaint speaks for itself. Equifax denies all remaining allegations in this sentence. As to the third sentence of Paragraph 1, Equifax states this sentence contains a legal conclusion for which no response is necessary. To the extent this sentence requires a response, Equifax denies all allegations in this sentence.

2. Equifax states Plaintiff's Complaint speaks for itself. Equifax denies all remaining allegations in Paragraph 2.

3. Equifax states Plaintiff's Complaint speaks for itself. Equifax denies all remaining allegations in Paragraph 3.

4. Equifax states Paragraph 4 contains a legal conclusion for which no response is necessary. To the extent this Paragraph requires a response, Equifax denies all allegations in Paragraph 4.

5. Equifax states Paragraph 5 contains a legal conclusion for which no response is necessary. To the extent this Paragraph requires a response, Equifax denies all allegations in Paragraph 5.

6. Equifax restates and incorporates by reference its answers to Paragraphs 1 through 5 as if fully set forth herein.

7. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7; those allegations therefore stand denied.

8. Equifax states Paragraph 8 contains a legal conclusion for which no response is necessary. To the extent this Paragraph requires a response, Equifax denies all allegations in Paragraph 8.

9. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9; those allegations therefore stand denied.

10. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10; those allegations therefore stand denied.

11. Equifax admits it is a consumer reporting agency as defined by the FCRA and that its headquarters are in Georgia. Equifax is without knowledge or information sufficient to form a

belief as to the truth of the remaining allegations in Paragraphs 11; those allegations therefore stand denied.

12. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations against other Defendants in Paragraph 12; those allegations therefore stand denied. As to the first sentence of Paragraph 12, Equifax states this sentence contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in this sentence. As to the second sentence of Paragraph 12, Equifax states this sentence contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in this sentence.

13. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations against other Defendants in Paragraph 13; those allegations therefore stand denied. Equifax denies all remaining allegations in Paragraph 13.

14. Equifax states Paragraph 14 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in this Paragraph.

15. Equifax denies the allegations in Paragraph 15.

16. Equifax restates and incorporates by reference its answers to Paragraphs 1 through 15 as if fully set forth herein.

17. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17.

18. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 18.

19. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19.

20. Equifax admits it is a consumer reporting agency in the United States. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 20; those allegations therefore stand denied. Equifax denies the remaining allegations in Paragraph 20.

21. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 21; those allegations therefore stand denied. Equifax states its consumer reports speak for themselves. To the extent the allegations in this Paragraph differ from those reports, Equifax denies the allegations in Paragraph 21.

22. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 22. Equifax admits it may obtain consumer information from multiple sources. Equifax denies any remaining allegations in Paragraph 22.

23. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 23; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 23.

24. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 24; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 24.

25. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 25; those allegations therefore stand denied. Equifax states Paragraph 25 contains a legal conclusion for which no response is necessary. To the extent this Paragraph requires a response, Equifax denies the allegations in Paragraph 25.

26. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 26; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 26.

27. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27; those allegations therefore stand denied.

28. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28; those allegations therefore stand denied.

29. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29; those allegations therefore stand denied.

30. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30; those allegations therefore stand denied.

31. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31; those allegations therefore stand denied.

32. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32; those allegations therefore stand denied.

33. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33; those allegations therefore stand denied.

34. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34; those allegations therefore stand denied.

35. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35; those allegations therefore stand denied.

36. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36; those allegations therefore stand denied.

37. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 37; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 37.

38. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38; those allegations therefore stand denied.

39. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 39; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 39.

40. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 40; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 40.

41. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 41; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 41.

42. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 42; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 42.

43. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 43; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 43.

44. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other Defendants in Paragraph 44; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 44.

45. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 45. Equifax denies the allegations against it in Paragraph 45.

46. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 46; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 46.

47. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 47; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 47.

48. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48; those allegations therefore stand denied.

49. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49; those allegations therefore stand denied.

50. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50; those allegations therefore stand denied.

51. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 51; those allegations therefore stand denied.

52. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 52; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 52.

53. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53; those allegations therefore stand denied.

54. Equifax denies any allegation in Paragraph 54 that it reported inaccurate information in Plaintiff's credit file. Equifax denies any remaining allegations in Paragraph 54.

55. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 55; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 55.

56. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 56; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 56.

57. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 57; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 57.

58. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 58; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 58.

59. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59; those allegations therefore stand denied.

60. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60; those allegations therefore stand denied.

61. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61; those allegations therefore stand denied.

62. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62; those allegations therefore stand denied.

63. Equifax is without knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 63; those allegations therefore stand denied.

64. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64; those allegations therefore stand denied.

65. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65; those allegations therefore stand denied.

66. Equifax denies the allegations in Paragraph 66.

67. Equifax denies the allegations in Paragraph 67.

68. Equifax denies the allegations in Paragraph 68.

69. Equifax denies the allegations in Paragraph 69.

70. Equifax denies the allegations in Paragraph 70.

71. Equifax denies the allegations in Paragraph 71.

72. Equifax denies the allegations in Paragraph 72.

73. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73; those allegations therefore stand denied.

74. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74; those allegations therefore stand denied.

75. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75; those allegations therefore stand denied.

76. Equifax denies the allegations in Paragraph 76.

77. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about other entities in Paragraph 77; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 77.

78. Equifax is without knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 78; those allegations therefore stand denied.

79. Equifax states Plaintiff's letter speaks for itself. To the extent the allegations in Paragraph 79 are inconsistent with that document, Equifax denies these allegations.

80. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80; those allegations therefore stand denied.

81. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81; those allegations therefore stand denied.

82. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82; those allegations therefore stand denied.

83. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83; those allegations therefore stand denied.

84. Equifax denies the allegations in Paragraph 84.

85. Equifax denies the allegations in Paragraph 85.

86. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 86. Equifax denies the allegations against it in Paragraph 86.

87. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 87; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 87.

88. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88; those allegations therefore stand denied.

89. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89; those allegations therefore stand denied.

90. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 90; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 90.

91. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 91; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 91.

92. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 92; those allegations therefore stand denied. Equifax denies the remaining allegations in Paragraph 92.

93. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 93; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 93.

94. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 94; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 94.

95. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95; those allegations therefore stand denied. Equifax further denies it reported any information inaccurately.

96. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96; those allegations therefore stand denied.

97. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97; those allegations therefore stand denied. Equifax further denies it reported any information inaccurately.

98. Equifax denies the allegations in Paragraph 98.

99. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 99; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 99.

100. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100; those allegations therefore stand denied.

101. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101; those allegations therefore stand denied. Equifax further denies it reported any information inaccurately.

102. Equifax restates and incorporates by references its answers to Paragraphs 1 – 101 as if fully set forth herein.

103. Equifax states Paragraph 103 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 103.

104. Equifax states Paragraph 104 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 104.

105. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 105; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 105.

106. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 106; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 106.

107. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 107; those allegations therefore

stand denied. Equifax states Paragraph 107 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations against it in Paragraph 107.

108. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 108; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 108.

109. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 109; those allegations therefore stand denied. Equifax states Paragraph 109 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations against it in Paragraph 109. Equifax further denies it engaged in “unreasonable procedures.”

110. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 110; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 110.

111. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 111; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 111.

112. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 112; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 112.

113. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 113; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 113.

114. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114; those allegations therefore stand denied.

115. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 115; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 115.

116. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 116; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 116.

117. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 117; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 117.

118. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 118; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 118.

119. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 119; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 119.

120. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 120; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 120.

121. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 121; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 121.

122. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 122; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 122.

123. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 123; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 123.

124. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 124; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 124.

125. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 125; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 125.

126. Equifax states Paragraph 126 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 126.

127. Equifax states Paragraph 127 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 127.

128. Equifax states Paragraph 128 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 128.

129. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 129; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 129.

130. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 130; those allegations therefore

stand denied. Equifax denies the allegations against it in Paragraph 130.

131. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 131; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 131.

132. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 132; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 132.

133. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 133; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 133.

134. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 134; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 134.

135. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 135; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 135.

136. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 136; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 136.

137. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations about the other Defendants in Paragraph 137; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 137.

138. Equifax is without knowledge or information sufficient to form a belief as to the

truth of the allegations about the other Defendants in Paragraph 138; those allegations therefore stand denied. Equifax denies the allegations against it in Paragraph 138.

139. Equifax restates and incorporates by reference its answers to Paragraphs 1 through 138 as if set forth fully herein.

140. Equifax states Paragraph 140 contains a legal conclusion for which no response is necessary. To the extent a response is necessary, Equifax denies the allegations in Paragraph 140.

141. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141; those allegations therefore stand denied.

142. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142; those allegations therefore stand denied.

143. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143; those allegations therefore stand denied.

144. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144; those allegations therefore stand denied.

145. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145; those allegations therefore stand denied.

146. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146; those allegations therefore stand denied.

147. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147; those allegations therefore stand denied.

148. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148; those allegations therefore stand denied.

149. Equifax is without knowledge or information sufficient to form a belief as to the

truth of the allegations in Paragraph 149; those allegations therefore stand denied.

150. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150; those allegations therefore stand denied.

151. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151; those allegations therefore stand denied.

152. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152; those allegations therefore stand denied.

153. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153; those allegations therefore stand denied.

154. Equifax is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154.

PRAYER FOR RELIEF

Equifax denies the allegations in the “WHEREFORE” paragraphs in the Prayer for Relief Section immediately following Paragraph 154, including all subparts, and denies that Plaintiff is entitled to any of the relief it seeks.

GENERAL DENIAL

Defendants deny each and every allegation and/or statement contained in the Complaint not expressly admitted herein.

AFFIRMATIVE DEFENSES

In further response to Plaintiff’s Complaint, Equifax hereby asserts the following defenses, without conceding that it bears the burden of proof as to any of them. Equifax reserves the right to assert additional defenses at such time and to such extent as warranted by discovery and the factual developments in this case.

1. The Complaint fails to state a claim upon which relief may be granted.
2. All claims against Equifax are barred because all information Equifax communicated to any third person regarding Plaintiff was true.
3. Plaintiff failed to mitigate her damages.
4. This action is barred by the doctrine of laches.
5. Equifax is informed and believes and thereon alleges that any alleged damages Plaintiff sustained were, at least in part, caused by the actions of Plaintiff herself and/or third parties and resulted from Plaintiff's own negligence which equaled to or exceeded any alleged negligence or wrongdoing by Equifax.
6. Any damages which Plaintiff may have suffered, which Equifax denies, were the direct and proximate cause of Plaintiff's conduct. Plaintiff is therefore estopped and barred from recovery of any damages.
7. Equifax has at all times complied with all applicable statutory, regulatory, and common law requirements, and accordingly, Plaintiff's claims are barred by Equifax's compliance with all applicable state, federal, and local laws and regulations.

WHEREFORE, having fully answered or otherwise responded to the allegations in Plaintiff's Complaint, Equifax prays that:

- (1) Plaintiff's Complaint be dismissed in its entirety and with prejudice, with all costs taxed against Plaintiff;
- (2) Equifax recover such other and additional relief as the Court deems just and appropriate.

DATED: January 13, 2022

Respectfully submitted,

/s/ Kymberly S. Kester

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*Counsel for Defendant Equifax Information
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January , 2022, I electronically filed with the Clerk of Court **DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S ANSWER TO PLAINTIFF'S COMPLAINT** using the CM/ECF system, which served a Notice of Electronic Filing on the following counsel of record pursuant to Local Rule 5.02(d):

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/s/ Kymberly S. Kester
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